Aramark – Groundwater>1000 ug/L TCE, TCE elevated vapor phase, PCE elevated vapor phase

(Substantial information on Aramark was submitted to U.S. EPA in 2013. A summary and UPDATE of that information follows below.)

Aramark Uniform & Career Apparel Group, Inc. ("Aramark") is located at 1200 Webster Street, Dayton, Ohio. Aramark currently owns and operates an industrial laundry facility at the location. Dry cleaning operations were conducted onsite sometime before 1977 until 1987 with PCE and TCE stored at the site as recently as 2006.

In 1991, three underground PCE storage tanks were removed from the site, which leaked into the surrounding soil area and the groundwater. During the tank removal activities, PCE, TCE, and DCE were identified in the soils surrounding the tank excavation area.

Aramark voluntarily implemented dual soil vapor extraction/air sparging and included the installation of five groundwater monitoring wells on the site. When the monitoring wells were installed in 1992, soil samples indicated that PCE and TCE were present in varying concentrations in the soil. PCE, TCE, and DCE were detected in several of the monitoring wells. A sampling event for the monitoring wells occurred on March 14, 2003. Concentrations for PCE were as high as 75µg/L and as high as 820µg/L for TCE, which are well above the MCLs of 5µg/L for both constituents.

In 2003, Aramark apparently unilaterally decided to cease operating the groundwater monitoring system, because it believed that the concentrations of PCE, TCE, and DCE were stabilized or decreasing over the 6 years the system was in operation.

Sampling from 2011 to 2014 of site monitoring wells indicated that TCE and PCE results were still above MCLs. The results for the 2014 event for AR-MW101I for TCE and PCE were 680µg/L and 230µg/L, respectively.

A monitoring well nest, MW-46 (shallow, intermediate, and deep) was installed downgradient of the site in 2007. Subsequent sampling of these wells from 2008, 2011 to 2015 indicated that TCE and PCE results are well above MCLs. The TCE and PCE results from the most recent sampling were 260µg/L and 690µg/L for MW-46S (2014); 800µg/L and 10µg/L for MW-46I (2015); and 960µg/L and 70µg/L for MW-46D (2015). See Shallow TCE Concentration map for location of property in relation to the Mahle-Behr Dayton facility as well as well locations.

Supplemental information relating to Vapors:

A sub-slab gas sample was collected from the property (Webster Street Academy and Youth Center) immediately downgradient of the site in the 2010. The results of this event indicated elevated vapor phase TCE (136 ppb) and PCE (4120 ppb) were present underneath the slab. These results are well above the sub-slab screening levels established in 2006 for the area by the Ohio Department of Health and the Agency for Toxic Substances and Disease Registry. See

TCE and PCE Vapor Phase maps for location of property in relation to the Mahle-Behr Dayton facility in addition to well locations.

Because Aramark previously operated a dry cleaner onsite and owned three underground storage tanks which leaked PCE into the soil and groundwater impacting groundwater at the site with TCE and PCE, as well as other chemicals of concern, Aramark clearly is a liable party under CERCLA. Additionally, liability for operations at the site from 1977 onwards flows through various mergers to the present incarnation of Aramark.

Hohman Plating - Groundwater>100 ug/L TCE

(Substantial information on Hohman Plating was submitted to U.S. EPA in 2013. A summary and UPDATE of that information follows below.)

Hohman Plating is located due west of the southern portion of the Behr Dayton facility at 814 Hillrose Avenue in Dayton, Ohio. This facility is listed in USEPA's Toxic Release Inventory System (TRIS) and a RCRA Large Quantity Generator. This facility performs electroplating, plating, polishing, anodizing, and coloring. According to the current TRIS Facility Report, TCE is listed as a facility chemical but disused in 1992.

Numerous personal accounts transcribed in 1996-97 during employee (former and current) interviews cite extensive TCE usage and releases at the facility:

- Old Strip Room:
    - Reports of TCE and other chemicals being dumped onto the floor for many years;
    - Sworn statement by an employee stating that drums and tanks of chemicals were dumped into the floor drain which resulted in the cement being "eaten" away so that eventually, chemicals were dumped directly onto the soil below;
    - In 1990 Hohman installed a new floor, and discovered a strong chemical odor from soil underneath near where sump was located;
        - Soil was excavated. Samples collected were only analyzed for metals, no VOCs;
        - Account of soil excavated was removed and placed somewhere on the facility and "turned over" prior to disposal from site. Done to volatilize TCE;
    - Accounts of "reworking" of the Anodize Room which cited TCE odor emanating from sludge that had collected in sump with eyewitness accounts of large holes in the bottom of the sump pits. One worker overcome by fumes. 20 drums of sludge generated.
- TCE odors from sumps as well as visual accounts of concrete being "eaten" away to expose soil underneath.
- Accounts of semi-solids discharged to public storm sewer system from a clarifier used in the electroplating process.
- Accounts of acids disposed/released into floor sumps that would eventually "eat" away sumps.
- Several confirmations of baking of TCE waste drums to volatilize;
    - Linked to headaches a neighbor was experiencing during this time. Presumably, east of the facility where residential properties located on Hunter Avenue.
- Reports of solvents being "dumped" along fence next to alley (Hunter Ave.?).

- Sworn statements of conversations between employees discussing extensive contamination underneath the facility including TCE.
- Releases from over flowing tank trucks on east side of facility facing Hunter Avenue.
- Confirmation of a release of wastewater sludge from electroplating operations due to a press failure that flowed out onto Hunter Avenue east of the facility. Waste was eventually allowed to wash down a nearby storm sewer as per facility management. TRIS did indicate that in 1987, 1500 pounds of TCE was released into the City Of Dayton's sewer system. Not sure if related.

AECOM installed MW-41 (shallow, intermediate, and deep), well nest installed down gradient (due south) of the Hohman facility downgradient:

- In 2008, sampling was conducted by AECOM. TCE was detected above MCLs in MW-41S at 436µg/L; MW-41I at 441µg/L; and MW-41D at 651µg/L;
- In 2012 sampling was conducted by USEPA. TCE was detected above MCLs in MW-41S at 220µg/L; MW-41I at 160µg/L; and MW-41D at 220µg/L.
- In 2014 sampling was conducted by USEPA. TCE was detected above MCLs in MW-41S at 240µg/L; MW-41I at 230µg/L; and MW-41D at 190µg/L.
- In TW-1, installed up gradient (due north) of the Hohman facility, TCE was not detected
  In MW007, located between the Hohman facility and the Behr Dayton facility, 87 ppb of TCE was detected.

See Shallow TCE Concentration map for location of property in relation to the Mahle-Behr Dayton facility in addition to well locations.

Supplemental information relating to Vapors:

A sub-slab gas sample was collected from the property (642 Hillrose Ave) downgradient of the site in the 2009. The results of this event indicated elevated vapor phase TCE (789 ppb) and PCE (56.2 ppb) were present underneath the slab. These results are well above the sub-slab screening levels established in 2006 for the area by the Ohio Department of Health and the Agency for Toxic Substances and Disease Registry. See TCE and PCE Vapor Phase maps map for location of property in relation to the Mahle-Behr Dayton facility in addition to as well locations.

Therefore, U.S. EPA should issue Hohman Plating a General Notice Letter as soon as possible as well as a Special Notice Letter following completion of the RI/FS for the RD/RA work at the Site.

Simclar - Groundwater>100 ug/L TCE

(Substantial information on Simclar was submitted to U.S. EPA in 2013. A summary and UPDATE of that information follows below.)

The Simclar facility at 1784 Stanley Avenue, Dayton OH 45404 ("Simclar Facility") is located up-gradient, just northwest of the Behr Dayton Facility. Simclar ceased operations in 2014. The facility is zoned as

industrial and is currently vacant with First Priority Holdings, LLC out of Lexington, KY listed as the current owner.

On March 15, 2012, the Ohio Environmental Protection Agency (Ohio EPA) sent requests for information about the facility located at 1784 Stanley Avenue to Globe Motors (prior owner and operator of the facility) (Exhibit 2) and to Simclar, Inc. (current owner of the Simclar Facility).

Analytical results from a 2007 sampling event show elevated concentrations of chlorinated solvents. In the requests for information, Ohio EPA cited analytical results from a federal site inspection sample taken from a monitoring well located on the eastern side of the building at the Simclar Facility. The sample was taken on July 18, 2007. Ohio EPA's document also indicated that three chlorinated solvents present in the sample exceeded the federal drinking water standard or maximum contaminant level (MCL). 1,1,1-trichloroethane (1,1,1-TCA) was detected at 710 µg/L (MCL is 200 µg/L), trichloroethene (TCE) was detected at 520 µg/L (MCL is 5 µg/L), and tetrachloroethene (PCE) was detected at 22 µg/L (MCL is 5 µg/L). Analytical results from a March 2014 sampling event conducted by U.S. EPA of three onsite wells , MW-1-SC, MW-2-SC, and MW-3-SC , indicated elevated TCE and 1,1,1-TCA results in two of the wells (MW-1-SC at 100µg/L and 68µg/L, MW-3-SC at 20µg/L and 30µg/L).

Impacts from this facility also have been demonstrated through groundwater analytical results for the shallow monitoring well MW-015S located on the west side of the former Chrysler facility in the vicinity of the guard shack. In this location, PCE concentrations have continued to increase over years, with PCE reported at 84µg/L in November 2003 sampling of MW-015S and a maximum PCE concentration of 850µg/L in March 2014 conducted by U.S. EPA. See Shallow TCE Concentration map for location of property in relation to the Mahle-Behr Dayton facility as well as well locations.

Therefore, U.S. EPA should issue Simclar a General Notice Letter as soon as possible as well as a Special Notice Letter following completion of the RI/FS for the RD/RA work at the Site.

Gem City - Groundwater>100 ug/L TCE

(Substantial information on Gem City was submitted to U.S. EPA in 2013. A summary and UPDATE of that information follows below.)

This facility is located at 1287 Air City Avenue, Dayton, OH and up-gradient of the Mahle-Behr Dayton facility to the northeast. Groundwater flow is from Gem City toward the Mahle-Behr Dayton. CSX previously owned the property; leased it to Air City Fuels (storing and distributing fuel oil and coal); Gem City bought Air City Fuels, and then later bought the property from CSX.

Gem City is engaged in blending and repackaging chemicals, including chlorinated solvents (1,1,1-TCA, PCE, and TCE) and is listed as potential source and contributor to VOC plume. The U.S. EPA issued a Special Notice Letter to Gem City (November 14, 2007); Special Notice Letters were also issued to DaimlerChrysler, Behr Dayton, and Aramark.

In 1986, Gem City removed 10 USTs from the property, at least some of which were used to store solvents (unclear whether they were chlorinated solvents). Groundwater and soils on Gem City's property are impacted by chlorinated solvents and Gem City is under a 1992 administrative order with the Ohio EPA to conduct groundwater remediation at its property (including a groundwater pump and treat system [installed January 1990] and a soil vapor extraction system – no longer operational) .

The Gem City plume appears to co-mingle with the Mahle-Behr Dayton plume. Groundwater sampling events conducted by U.S. EPA in 2011, 2012, and 2014 indicated concentrations of PCE and TCE above MCLs (5 µg/L for both). During this time, the highest concentrations of PCE and TCE occurred in MW-101S; PCE was at 60 µg/L during the 2011 event and TCE was 140 µg/L during the 2012 event. See Shallow TCE Concentration map for location of property in relation to the Mahle-Behr Dayton facility in addition to as well as well locations.

Therefore, U.S. EPA should issue Gem City a General Notice Letter as soon as possible as well as a Special Notice Letter following completion of the RI/FS for the RD/RA work at the Site.

Additional PRPs Based on 2007-2017 groundwater and vapor phase data

All of the following companies have recent groundwater and vapor phase data with exceedances of MCLs in groundwater and vapors in excess of the TCE vapor standard of 2 ug/L. The groundwater and vapor phase data follows below:

Paint America/ MAB Paints and Coatings - Groundwater>100 ug/L TCE, TCE elevated vapor phase

A trucking company called USA Freight, LLC currently occupies the property. The old facility was demolished and cleared except for a large truck garage in the center of the property. Property is due south of Hohman Plating.

AECOM installed MW-41 (shallow, intermediate, and deep), well nest installed at the northwest end of the property.

- In 2008, sampling was conducted by AECOM. TCE was detected above MCLs in MW-41S at 436µg/L; MW-41I at 441µg/L; and MW-41D at 651µg/L;
- In 2012 sampling was conducted by USEPA. TCE was detected above MCLs in MW-41S at 220µg/L; MW-41I at 160µg/L; and MW-41D at 220µg/L.
- In 2014 sampling was conducted by USEPA. TCE was detected above MCLs in MW-41S at 240µg/L; MW-41I at 230µg/L; and MW-41D at 190µg/L.
- In MW007, located between the former facility and the Behr Dayton facility, 87 ppb of TCE was detected.

See Shallow TCE Concentration map for location of property in relation to the Mahle-Behr Dayton facility in addition to well locations.

Supplemental information relating to Vapors:

A sub-slab gas sample was collected from the property (606 Hillrose Ave.) immediately adjacent to the south-southwest of the site in the 2009. The results of this event indicated elevated vapor phase TCE (14,400 ppb) and PCE (111 ppb) were present underneath the slab. These results are well above the sub-slab screening levels established in 2006 for the area by the Ohio Department of Health and the Agency for Toxic Substances and Disease Registry. See TCE and PCE Vapor Phase maps map for location of property in relation to the Mahle-Behr Dayton facility as well as well locations.

Sheffield Machine - Groundwater>1000 ug/L TCE, TCE elevated vapor phase

DJINNI Industries - Groundwater>1000 ug/L TCE, TCE elevated vapor phase

Supplemental information relating to Vapors:

A sub-slab gas sample was collected from the property (1003 Keowee Ave., Electropolish) immediately adjacent to the southeast of the site in the 2010. The results of this event indicated elevated vapor phase TCE (3,140 ppb) and PCE (505 ppb) were present underneath the slab. These results are well above the sub-slab screening levels established in 2006 for the area by the Ohio Department of Health and the Agency for Toxic Substances and Disease Registry.

Bront Machining - Groundwater>1000 ug/L TCE, TCE elevated vapor phase

Electro Polish Co. - Groundwater>1000 ug/L TCE, TCE elevated vapor phase

Consolidated Vehicle Converters

The property is currently occupied by a retail store called WIT (Whatever-It-Takes) specializing in transmission auto parts.

U.S. EPA immediately should issue Section 104 (e) requests to those companies listed below, in order to obtain any data that would further support a liablity finding. However, the data recited above clearly is sufficient for U.S. EPA to issue Paint America/MAB Paints and Coatings, Sheffield Machine, DJINNI Industries, Bront Machining and ElectroPolish Co. General Notice Letters as soon as possible as well as a Special Notice Letters following completion of the RI/FS for the RD/RA work at the Site.